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37. (Amended) A method of creating in a computer readable memory a structured workfolder for organizing electronic documents comprising the steps of:

- creating a structured workfolder root node, said root node containing a contents element for storing primary data therein; and
- creating at least one placeholder reserving a slot within said workfolder for documents expected to be linked to said workfolder via said placeholder.

REMARKS

This communication is in response to the Final Office Action dated October 23, 2000. The Final Office Action mailed October 23, 2000 has been reviewed and carefully considered. Claims 1, 28 and 37 are amended. No new matter has been added. Claims 1-58 are pending in this application, with claims 1, 28 and 37 being the only independent claims.

Before proceeding further, applicant gratefully acknowledges the telephone interview held with the Examiner on January 12, 2001. The courtesy and cooperative spirit shown by the Examiner during these discussions is appreciated. Although no agreement was reached, the comments and insight provided by the Examiner are helpful in applicant's understanding of how to overcome the prior art rejections.

In the Final Office Action mailed October 23, 2000, claims 1-58 are rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 5,819,295 (Nakagawa).

The present invention is directed to a structured workfolder which is a shared structured data object that provides a data environment where all documents, supporting data,

and history related to a unit of work may be grouped together. Placeholders within the data object are used to indicate documents expected to be placed in the workfolder, even before they are created. Thus, the workfolder serves to organize presently created documents, but also reserves and allocates space within the workfolder for document that are expected to be created or received by the workfolder in the future.

Applicant submits that claims 1, 28 and 37, as amended, are not anticipated by Nakagawa. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Independent claim 1 expressly states "said contents element containing one or more placeholders reserving a slot within said workfolder for documents expected to be added to said workfolder"(emphasis added). The specification of the present invention defines the term "placeholder" as "a slot that has been reserved for one or more specific documents not yet created or received" (p. 7, ll. 6-7). Thus, there is an allocation of space (slots) within the workfolder itself for a document to be expected, that is a document that has not been created at all or a document that has been created but not yet received by the particular workfolder.

On the other hand, Nakagawa is directed to a system for storing and managing documents in a hierarchical structure according to classifications. The underlying purpose of the invention is to provide "a document storing and managing system which can execute version management in a unit of folder to retrieve documents by designating a version or move and discard documents in a unit of folder in the operation" (Col. 2, ll. 22-26). In accordance

with that goal, the entire contents (all documents) of a particular folder may be retrieved, deleted, or moved together as a single unit between folders. The reference, however, fails to disclose or suggest that a particular folder contains a placeholder, that is, a slot (space) within a folder reserved, in advance, for a document expected to be added to the workfolder, as found in independent claims 1, 28 and 37.

The Examiner in her remarks states

"Applicants argued that '[t]he reference fails to disclose or suggest that the workfolders contain a content element containing one or more placeholders for indicating documents expected to be added to the workfolder via the placeholder' (page 2, line 11-14) is not correct. Applicants persistently argued about the non-disclosure of this limitation in the cited reference, Nakagawa et al., for claims 1, 28, and 37. The Nakagawa patent specifically discloses 'to specify a version of a folder to retrieve related documents in each folder as a unit of operation, move documents in older versions to another storage place collectively, or deleted documents in old versions collective.' and 'it is possible to use it separately in plural folders.' in column 2, lines 58-62 and lines 64-65, which clearly disclose the document deleting and adding technique used in plural folders. Applicants' choice of using 'workfolder' and 'placeholder' instead of 'plural folders' is the only difference at issue. However, the terminology difference or the 'folder label' difference does not entitle any patentable weight." (Pages 6-7, Final Office Action dated October 23, 2000).

Applicant respectfully traverses the Examiner's interpretation of the present claimed invention and submits that Nakagawa merely discloses retrieving, deleting and moving files between folders. The claimed "placeholder" is not another folder, as suggested by the Examiner, but instead is an allocation of space (a slot) within a particular workfolder in advance of a document being created or received by the workfolder. There is no teaching or

suggestion in Nakagawa for reserving a space within a folder in advance of a document to be expected. Nakagawa merely discloses moving existing documents between folders.

Independent claims 28 and 37 contain similar limitations to that discussed above with respect to claim 1 and thus these claims are also patentable over the art cited by the Examiner for the reasons provided above.

Dependent claims 9-17 are further distinguishable over the prior art reference in that they further define the placeholder. As mentioned above with respect to independent claim 1, Nakagawa fails to disclose or suggest a placeholder, much less, the further limitations on the placeholder as found in dependent claims 9-17.

For the foregoing reasons, applicant respectfully submits that independent claims 1, 28 and 37 are patentable. Claims 2-27 depend from independent claim 1 and thus are patentable for the same reasons that independent claim 1 is patentable. Claims 29-36 depend from independent claim 38 and thus are patentable for the same reasons that independent claim 28 is patentable. Claims 38-58 depend from independent claim 37 and thus are patentable for the same reasons that independent claim 37 is patentable. Dependent claims 9-17 are further distinguishable over the prior art reference for the additional reasons discussed above.

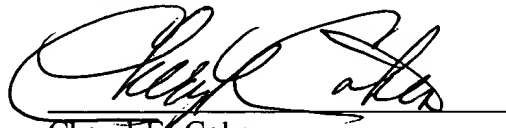
Applicant respectfully submits that this application is in condition for allowance, and such action is respectfully requested.

Applicants submit that the amendments to the claims do not raise new issues that would require further consideration and/or search. Claims 1, 28 and 37 have merely been amended, for clarification, to further specify that the term "placeholder" conforms with its

definition as found in the specification. Since the term "placeholder" in the claims, as originally filed, must have been read by the Examiner in light of the definition in the specification, applicant submits that no new issues or further consideration is required in view of the amendment. Entry of the Amendment and passage of this case to issue are earnestly solicited.

It is believed that no fees or charges are currently due. However, if any fees or charges are required at this time in connection with the application, they may be charged to our Patent and Trademark Office Deposit Account No. 04-100.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Cheryl E. Cohen', is written over a horizontal line.

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ATTACHMENT

MARKED UP VERSION OF AMENDED CLAIMS

1. (Amended) A computer readable memory having a plurality of storage locations for storing records in the computer readable memory, said memory comprising:
at least one structured workfolder for storing and organizing electronic documents;

said workfolder containing a contents element for storing primary data, said contents element containing one or more placeholders for [indicating] reserving a slot within said workfolder for documents expected to be added to said workfolder via said placeholder.

28. (Amended) A computer readable memory having a plurality of storage locations for storing records in the computer readable memory, said memory comprising:

a template used to create one or more particular instances of a structured workfolder for storing and organizing electronic documents;

said template containing a contents element;

said contents element containing a placeholder for [indicating] reserving a slot within said workfolder for documents expected to be linked to said workfolder instance, said documents being linkable to said workfolder instance via a particular instance of said placeholder in said workfolder instance.

37. (Amended) A method of creating in a computer readable memory a structured workfolder for organizing electronic documents comprising the steps of:

creating a structured workfolder root node, said root node containing a contents element for storing primary data therein; and

creating at least one placeholder reserving a slot within said workfolder for [indicating] documents expected to be linked to said workfolder via said placeholder.